

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

**UNITED STATES OF AMERICA,**

*Plaintiff,*

**v.**

**BROOKLYN ELAINE WILSON,**

*Defendant.*

**Case No. CR-24-069-RAW**

---

**MOTION FOR ADDITIONAL ONE LEVEL REDUCTION**  
**FOR ACCEPTANCE OF RESPONSIBILITY**

**COMES NOW** the plaintiff, the United States of America, by and through Christopher J. Wilson, United States Attorney, and Caila M. Cleary, Assistant United States Attorney, and moves this Honorable Court to grant an additional one level reduction in the advisory guideline sentence range for timely acceptance of responsibility thereby permitting the government to avoid preparing for trial and allowing the Court to allocate its resources efficiently pursuant to U.S.S.G. § 3E1.1(b).

Respectfully submitted,

CHRISTOPHER J. WILSON  
United States Attorney

s/ Caila M. Cleary  
CAILA M. CLEARY  
NY Bar # 5587951  
Assistant United States Attorney  
520 Denison Ave.  
Muskogee, OK 74401  
Telephone: (918) 684-5100  
Fax: (918) 684-5150  
Caila.Cleary@usdoj.gov

**CERTIFICATE OF SERVICE**

I hereby certify that on April 22, 2025, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

Robert Gifford, II, Counsel for Defendant

s/ Caila M. Cleary  
CAILA M. CLEARY  
Assistant United States Attorney